



**STATE OF ARIZONA**  
**DEPARTMENT OF INSURANCE**

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**CHARLES R. COHEN**  
Director of Insurance

Former Director Susan Gallinger issued the following Circular Letter on April 17, 1992:

**CIRCULAR LETTER NO. 92-3**

**TO:** ALL HEALTH CARE SERVICES ORGANIZATIONS; HOSPITAL, MEDICAL SERVICE CORPORATIONS; LIFE AND DISABILITY INSURERS; INSURANCE TRADE ASSOCIATIONS; INSURANCE MEDIA PUBLICATIONS; AND OTHER INTERESTED PERSONS

**FROM:** SUSAN GALLINGER, DIRECTOR OF INSURANCE

**DATE:** APRIL 17, 1992

**RE:** **USE OF UNITED STATES DRUG ENFORCEMENT ADMINISTRATION (DEA) REGISTRATION NUMBERS AS PHYSICIAN IDENTIFICATION NUMBERS**

The Arizona Department of Insurance ("ADOI") has recently received complaints from physicians regarding insurers' use of DEA registration numbers as physician identification numbers. One physician who complained stated that his patient was denied service by a pharmacy for a prescription for a medication that was not a controlled substance (an antibiotic). Both the physician and the patient were told that the physician's DEA number was required before the pharmacy could file an insurance claim for reimbursement. Thus, the pharmacy would not fill the prescription for an antibiotic without the physician's DEA registration number.

As a result of these complaints, ADOI has sought input from DEA on the appropriateness of insurers' use of DEA registration numbers as physician identification numbers. The response from G. Thomas Gitchel, Chief of the DEA Liaison and Policy Section states:

The DEA system of registration was designed to establish a closed system of distribution of controlled substances from the point of manufacture to the point at which they are dispensed to the ultimate user. **DEA strongly opposes the use of a DEA registration number for any purpose other than to provide certification of registration in**

**transactions involving controlled substances. The use of DEA numbers as identification numbers by the insurance industry is not a legitimate use of the system.**

DEA believes that abuses such as these could lead to a weakening of the registration system.

ADOI supports the efforts of DEA in protecting the integrity of the registration system for monitoring and controlling the distribution of controlled substances. Alternative means of physician identification are readily available in the form of social security numbers, federal tax identification numbers or license numbers assigned by the various licensing boards. Insurers are therefore requested to discontinue the use of DEA registration numbers as physician identification numbers.